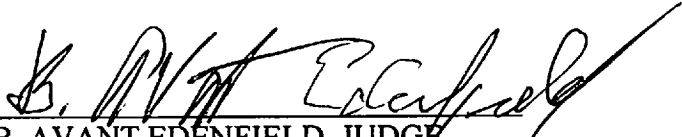


¹ 18 U.S.C. § 3582(c) allows sentencing courts to modify terms of imprisonment if the Bureau of Prisons files a motion asking for a reduction due to age and circumstances; if the government files a Federal Rule of Criminal Procedure 35 motion; or if the prisoner's advisory sentencing guidelines range has been lowered by retroactive amendment.

Castro v. United States, 540 U.S. 375, 383 (2003) (requiring courts to give pro se litigants notice of their intent to recharacterize a pleading as a 2255 petition in light of the restrictions on second or successive habeas petitions). Arroyo-Higuera should, however, be aware of the time limits on such petitions in deciding whether to file. *See* 28 U.S.C. § 2255(f)(1) (setting a one year time limit on filing, running from the day a prisoner's conviction becomes final).

The 29 day of August, 2013


B. AVANT EDENFIELD, JUDGE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA